



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

JUL 23 2015

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**Article Number: 7015 0640 0007 6347 5391**

Honorable Gayle Brill Mittler, Mayor  
Borough of Highland Park  
221 S. Fifth Avenue  
Highland Park, New Jersey 08904

Re: **Request for Information**  
**Docket No. CWA-IR-15-026**  
**EPA/NJDEP Sanitary Sewer System Compliance Evaluation Inspection**  
**February 25, 2015**  
**Borough of Highland Park**  
**ICIS/NPDES No. NJP000359**  
**NJDEP Sanitary Sewer ID No. 55040**

Honorable Mayor Mittler:

Please find enclosed a Request for Information (“RFI”) letter, which the U.S. Environmental Protection Agency (“EPA”) Region 2 is issuing to the Borough of Highland Park (“Highland Park”) pursuant to Section 308(a) of the Clean Water Act (“CWA”), 33 U.S.C. §1318(a). The EPA is issuing the RFI letter to require Highland Park to provide specific information regarding the findings of the enclosed inspection report.

Section 308(a) of the CWA, 33 U.S.C. §1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. §1311 or carrying out section 402 of the CWA, 33 U.S.C. §1342, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the Clean Water Act, EPA may require the submission of information necessary to assess any facility/site and its related appurtenances for carrying out the provisions of the CWA.

On February 25, 2015, EPA along with representatives of the New Jersey Department of Environmental Protection (“NJDEP”) conducted a Sanitary Sewer System Inspection of the Highland Park Sanitary Collection System. The enclosed inspection report lists potential non-compliance items as well as areas of concern, which are items that should be addressed to improve the operation and maintenance of the collection system. Additionally, the Middlesex County Utilities Authority (“MCUA”) wastewater treatment plant (“WWTP”), which Highland Park discharges to, has had exceedances of its New Jersey Pollutant Discharge Elimination System (“NJPDES”) Permit and wet weather bypassing related to high wastewater flows during periods of wet weather.

## **REQUEST FOR INFORMATION**

Highland Park is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. §1318(a), to submit the requested information regarding the subject construction site.

1. **Within forty five (45) calendar days** of receipt of this letter, respond to the EPA in writing with the actions (including a schedule) that Highland Park has taken or will take to address: the potential non-compliance items and areas of concern identified in the enclosed inspection report.
2. **Within ninety (90) calendar days** of receipt of this Request respond to EPA in writing with:
  - a. Highland Park's most recent Infiltration/Inflow (I&I) Reduction Program document if required by MCUA and/or existing plans, cost estimate and schedules for its I&I Reduction Program.
  - b. Specific targets for the volume of I&I removal per year.
  - c. The 4 most recent Infiltration/Inflow Reduction Program Reports that were sent to MCUA
  - d. 2014 Municipal Separate Storm Sewer System Annual Report and records showing the Illicit Discharge Detection and Elimination inspections of storm sewer outfalls for 2014.

## **CERTIFICATION**

Any documents to be submitted by Highland Park as part of this Request for Information shall be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 CFR §122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All information required to be submitted pursuant to this Request for Information shall be sent by certified mail or its equivalent to the following addresses:

Larry Gaugler, NPDES Team Leader  
Water Compliance Branch  
Division of Enforcement and Compliance Assistance  
U.S. Environmental Protection Agency – Region 2  
290 Broadway, 20th Floor

Marcedius T. Jameson, Director  
Water and Land Use Enforcement  
New Jersey Department of Environmental Protection  
Mail Code 401-04F, 401 East State Street  
P.O. Box 420  
Trenton, NJ 08625-0420

Should you have any questions regarding this request, feel free to have your staff contact Larry Gaugler, NPDES Team Leader at (212) 637-3950.

Sincerely,



Douglas McKenna, Chief  
Water Compliance Branch  
Division of Enforcement and Compliance Assistance

Enclosure

cc: Marcedius T. Jameson, Director, Water and Land Use Enforcement, NJDEP  
Melissa Hornsby, NJDEP via email [Melissa.Hornsby@dep.state.nj.us](mailto:Melissa.Hornsby@dep.state.nj.us)  
Thomas Sweeney, NJDEP via email [Thomas.Sweeney@dep.nj.gov](mailto:Thomas.Sweeney@dep.nj.gov)  
Donald Rish, Supt. Public Works & Public Utilities [drish@hpboro.com](mailto:drish@hpboro.com)





United States Environmental Protection Agency  
Washington, D.C. 20460  
**Water Compliance Inspection Report**

Form Approved.  
OMB No. 2040-0057

**Section A: National Data System Coding (i.e., PCS)**

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
11	N J P 0 0 0 3 5 9	1 5 0 2 2 5 17	18 &	19	20 1
Remarks					
2					
66					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved	
6 1 69	70	71	72	73	74 7 80

**Section B: Facility Data**

Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time/Date	Permit Effective Date
Borough of Highland Park, Department of Public Works, 444 Valentine Ave. Highland Park, NJ	02/25/15; 9:30AM	
	Exit Time/Date	Permit Expiration Date
	02/25/15; 3:30 PM	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
Robert Fullagar 732-634-1500, Licensed Collection System Operator Francis Troy, Foreman, Highland Park, ftroy@hpboro.com (732) 51-1277,	NJDEP Sanitary Collection System ID No.55040	
Name, Address of Responsible Official/Title/Phone and Fax Number(s)	Contacted	
Donald Rish, Supt. Public Works & Public Utilities drish@hpboro.com (732) 247-9379	X Yes No	

**Section C: Areas Evaluated During Inspection (Check only those areas evaluated)**

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> CSO/SSO (Sewer Overflow)
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent/Receiving Water	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

**Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)**

See attached compliance evaluation inspection report for inspection findings.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Murray Lantner, P.E.	EPA/DECA-WCB/(212) 637-3976 FAX: 3953	7/2/15
Signature of Management Q/A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Larry Gaugler, P.E. Chief NPDES Team	EPA/DECAWCB (212) 637-3950, Fax 212 637-3953	7/23/15



# INSTRUCTIONS

## Section A: National Data System Coding (i.e., PCS)

**Column 1: Transaction Code:** Use N, C, or D for New, Change, or Delete. All inspections will be new unless there is an error in the data entered.

**Columns 3-11: NPDES Permit No.** Enter the facility's NPDES permit number - third character in permit number indicates permit type for Unpermitted, Q=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary)

**Columns 12-17: Inspection Date.** Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

**Column 18: Inspection Type\*.** Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	I Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	Q Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	- Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	+4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

**Column 19: Inspector Code.** Use one of the codes listed below to describe the lead agency in the inspection.

A --- State (Contractor)	O --- Other Inspectors, Federal/EPA (Specify in Remarks columns)
B --- EPA (Contractor)	P --- Other Inspectors, State (Specify in Remarks columns)
E --- Corps of Engineers	R --- EPA Regional Inspector
J --- Joint EPA/State Inspectors—EPA Lead	S --- State Inspector
L --- Local Health Department (State)	T --- Joint State/EPA Inspectors—State lead
N --- NEIC Inspectors	

**Column 20: Facility Type.** Use one of the codes below to describe the facility.

- 1 --- Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 --- Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 --- Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 --- Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 --- Oil & Gas. Facilities classified with 1987 SIC 1311 to 1399.

**Columns 21-66: Remarks.** These columns are reserved for remarks at the discretion of the Region.

**Columns 67-69: Inspection Work Days.** Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing, and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

**Column 70: Facility Evaluation Rating.** Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

**Column 71: Biomonitoring Information.** Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

**Column 72: Quality Assurance Data Inspection.** Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

**Columns 73-80:** These columns are reserved for regionally defined information.

## Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

## Section C: Areas Evaluated During Inspection

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 2, DECA-WCB**

**20<sup>th</sup> Floor, 290 Broadway, NY, NY 10007**

**SANITARY SEWER SYSTEM  
COMPLIANCE EVALUATION INSPECTION REPORT**

**Compliance Evaluation Inspection:** Highland Park  
NJDEP Program Interest ID No.55040 Sanitary System  
EPA ICIS No. NJP000359  
Satellite Sanitary System of the Middlesex County Utilities Authority Wastewater Treatment Plant  
(NJPDES Permit No. NJ0020141)

**Inspection Date:** February 25, 2015

**Inspection Time:** ~9:30 to 3:30PM

**EPA Inspectors:**

Murray Lantner, P.E. Environmental Engineer, EPA Region 2, DECA-WCB (212) 637-3976

Cyndy S. Kopitsky, EPA Region 2, DECA-WCB, 212.637.3832. Kopitsky.cindy@epa.gov

**NJDEP Inspector :**

Thomas Sweeney, Env. Specialist, NJDEP, Central Bureau of Water Compliance and Enforcement  
Thomas.Sweeney@dep.nj.gov, (609) 292 3010, Cell (609) 439-9531

**On-Site Representatives:**

Donald Rish, Supt. Public Works & Public Utilities [drish@hpboro.com](mailto:drish@hpboro.com) (732) 247-9379

Robert Fullagar 732-634-1500, Licensed Collection System Operator

Francis Troy, Foreman, Highland Park, [ftroy@hpboro.com](mailto:ftroy@hpboro.com) (732) 51-1277, Borough of Highland Park,  
DPW, 444 Valentine Ave. Highland Park, NJ

**Site Information:**

Borough of Highland Park, Department of Public Works, 444 Valentine Street, Highland Park, NJ,  
08904

**Precipitation Information:** New Brunswick NJ – 0.00” on 12/4/14, 0.21” on 12/3/14; and 0.14” on  
12/2/14 <http://www.njweather.org>

**I. Introduction**

1. EPA conducted a Sanitary Sewer System Compliance Evaluation Inspection (“CEI”) on February 25, 2015 of the Borough of Highland Park’s (“Highland Park’s”) Sanitary Sewer System.
2. Highland Park’s population, based upon 2010 census information, was 13,982 people and its area covers about 1.8 square miles.
3. Highland Park operates a 100% separate sanitary sewer system and there are no sanitary pump stations. The sanitary sewer system is approximately 152,000 feet (28.8 miles). The sanitary sewer pipes date 80 to 90 years and range in diameter from 8” to 15”. Manhole spacing was said to be approximately every 300 to 500’ with average spacing of 300 to 350’. All lateral lines were said to be the homeowner’s responsibility.

4. Sanitary flows from Highland Park flow to through MCUA metering chambers at Cleveland Ave.(North), River Road and Donaldson Park (South). There are no upstream contributors to Highland Park's sanitary system.
5. Highland Park said that 2 years ago they cleaned (jetted) the entire collection system. Representatives said that they have a list of known problem spots (roots) and will add a biocide. In terms of CCTV work Highland Park said that they share resources with Edison. If they have big job will have to contract it out. Generally CCTV work is done as part of a repaving project.
6. Fats Oils and Grease (FOG) – Highland Park representatives said that the County Board of Health, Health inspector, conducts annual restaurant inspections and also checks grease traps. They said that residential grease is not generally a problem. They explained that they add the dry bacteria for grease reduction at 4 locations, twice per week, one location is behind Brookdale Court. Town Code Enforcement can also check grease traps (more likely upon installations).
7. Water billing - Representatives said that they have 200 Automatic Meter Readers in place, but outside of that they spend several months reading water meters.
8. Representatives explained that there is a local ordinance against sump pump connections to the sanitary sewer. As shown in attachment 3, Highland Park has a program to inspect for illegally connected sump pumps.
9. Representatives explained that they have a list of known trouble spots where they conduct weekly checks and monthly checks and conducting cleaning/jetting in these locations.
10. Map of system - Highland Park's sanitary sewer map was available in hard copy (See Photo DSCN2663 ("2663") in Attachment 1.
11. Sewer bills are based upon water consumption, but sewer bills are reduced 15% off for pools and sprinklers. This is done through the billing department, bills were not available.

## **II. Summary of Potential Noncompliance and Areas of Concern**

### **A. Potential Noncompliance**

1. Highland Park said that they had reported a Sanitary Sewer Overflow ("SSO")/spills in 2007. Representatives said that there were no SSOs in the past five years except for during large storms (like Hurricanes Irene and Sandy). However, review of NJDEP Data Miner incident reports [http://datamine2.state.nj.us/DEP\\_Opra/OpraMain/categories?category=Incidents+and+Complaints](http://datamine2.state.nj.us/DEP_Opra/OpraMain/categories?category=Incidents+and+Complaints) for Highland Park did not show that incidents (sanitary sewer overflows or sewage flows) were reported during or following Hurricane Irene (Aug. 28, 2011) nor during or following Hurricane Sandy on October 29, 2012 and continuing. Review of Data Miner incident reports (Attachment 2) for the Period January 1, 2010 to the June 15,



2015 contained 2 incident reports related to sewage overflows during a storm event dated December 22, 2012 and January 8, 2013. Highland Park must determine if there are capacity issues or excessive I&I that caused sewage overflows that were reported on 12/22/12 and 1/8/13. Discharges of sewage to surface waters without a Permit does not conform with Section 301 of the Clean Water Act. Additionally, all Sanitary Sewer Overflows must be reported to NJDEP, even those that take place during large storm events like Hurricanes Irene and Sandy.

**B. Areas of Concern:**

2. Highland Park does not have written procedures to respond to overflows and spills. It is recommended to have written procedures to address sewage overflows and basement backups to cease the overflows/backups and to clean up after the overflows and provide information to building owners on how to safely clean up after a backup.
3. Highland Park said that their collection system is insured under the Joint Insurance Fund and provided EPA with insurance claims for backups for the period 2010 to Feb. 2015 and are shown in the table below.

**Table 1: Insurance Claims for Highland Park Sewage 2010 to Feb. 2015**

	Claim No.	DOL	Status	Total Incurred	Total Paid	Address	Loss Description
1	X26701	2/9/2012	Closed	\$0	\$0	414 Graham St.	TWP S/LINE BLOCKAGE CAUSED DAMAGE
2	X62410	3/31/2013	Closed	\$0	\$0	66 Harrison St.	SEWER BACKED UP IN BASEMENT
3	2014070740	12/30/2013	Closed	\$0	\$0	123 Highland Ave.	SEWER BACK UP INTO BASEMENT
4	2014070573	1/6/2014	Closed	\$0	\$0	49 Brookdale Ct.	CLMT ALLEGES SEWER BACKUP INTO BASEMENT

4. EPA recommends that the location of blockages of Highland Park sanitary main lines be entered into a GIS system or spreadsheet with different column for address and street and if possible a summary of the cause of blockage, so Highland Park can identify problem areas that require additional inspection/cleaning and/or repair work Table 2 below is contains a summary of the collection system monthly reports for the period 2011 to 2014.

**Table 2: Summary of Collection System Monthly Reports 2011 to 2014**

	Total Sewer Miles		28.8	Total Feet	152064		
Year	FT of Sewer Cleaned	Percentage of Sewer System Cleaned Per Year	FT of Sewer Televised	Percentage of Sewer System Televised Per Year	Main Blockage	No. of Main Blockages Per 100 Miles of Sewer Per Year	Lateral Blockage
2011	58,524	38.5%	0	0.0%	8	27.8	36
2012	58,505	38.5%	0	0.0%	10	34.7	17
2013	52,119	34.3%	430	0.3%	12	41.7	25
2014	58,798	38.7%	0	0.0%	10	34.7	27

5. Typically Section 5(I) of the Participant Supplemental Agreement with MCUA states, "Infiltration/Inflow – Each Municipality and all public corporations discharging sewage into the Local Sewage System of a Municipality will maintain its Local Sewerage System in such a manner as to exclude any excessive infiltration and/or inflow from entering into the Local Sewerage System." As shown in Table 3 below several MCUA metering chambers that receive Highland Park's sanitary flows show a 2.5x increase (Flow difference 150% or greater than dry weather flows) in wet weather flows. Highland Park must include measures in its MCUA mandated I&I reduction plan to eliminate excessive I&I from its sanitary system. Also please note that MCUA's CSO Permit, described below, will require MCUA to implement MCUA to control excessive I&I in its satellite systems.
6. Part IV.F.1.h of MCUA's NJPDES Permit NJ0020141 which will take effect on July 1, 2015 requires that the permittee (MCUA) shall review its rules, ordinances, and/or its sewer use agreements and create an anticipated schedule to revise them within 6 months of the Effective Date of the Permit (EDP) if necessary. In general, this schedule shall not extend beyond the due date for the LTCP as per Part IV.D.3.b.iv of the Permit. This schedule shall require the customer municipalities to:
  - i. operate and maintain their treatment works,
  - ii. identify I/I and reduce it to meet the definition of non-excessive infiltration (in combined and separately sewered areas) and non-excessive inflow (in separately sewered areas) where both terms are defined in N.J.A.C. 7:14A-1.2, and
  - iii. identify and eliminate interconnections and cross-connections in storm sewers.
7. "Nonexcessive infiltration" means the quantity of flow which is less than 120 gallons per capita per day (domestic base flow and infiltration) or the quantity of infiltration which cannot be economically and effectively eliminated from a sewer system as determined in a cost-effectiveness analysis. For domestic treatment works receiving wastewater from combined sewers, nonexcessive infiltration means the quantity of flow attributable to

infiltration during dry weather shall be less than 40 gallons per capita per day (gpcd) or 1,500 gallons per day per inch diameter per mile of sewer.

8. "Nonexcessive inflow" means the maximum total flow rate during storm events which does not result in chronic operational problems related to hydraulic overloading of the treatment works or which does not result in a total flow of more than 275 gallons per capita per day (domestic base flow plus infiltration plus inflow) during a significant rainfall event which causes surface ponding and surface runoff. Chronic operational problems may include surcharging, backups, bypasses, and overflows.
9. Based on the threshold of 275 gallons per capita per day (gpcd) and Highland Park's population of 13,982 flows above 3.845 MGD exceed the nonexcessive inflow threshold. As shown in Table 3 below based upon data in MCUA's I&I reports for the period 2011 to 2014, during significant rainfall events, total flows in Highland Park's separate sewer system, exceeded the 3.845 MGD threshold for non-excessive inflow in 2011, 2012, 2013, 2014 with the highest daily flows in each year was 19.6, 13.8, 17.4, and 19.6 MGD respectively.

Highland Park representatives explained that they are working to reduce sump pump discharges and are looking for the sump pump connections. They explained that their I&I Reduction Plan for MCUA is focused on sump pumps, since there were said to be a lot of sump pumps tied into sanitary sewer laterals (See Attachment 3). Highland Park's goal is to do 1 sump pump inspection per day or 5 per week and they are now in the 3rd quarter for sump pump inspections (program started in June 2014). Representatives said that any time Highland Park personnel goes into a house - when a house is sold, a final reading, read a water meter, a high bill, basement backup - personnel will look for illegally connected sump pumps. If there is a connected sump pump they will tell the homeowner verbally first, then go back and check it and verify that the sump pump has been disconnected. The triangle area of Highland Park was thought to have the most illicit sump pump connections. Personnel thought this to be a good approach prior to doing CCTV and smoke testing. Records of the sump pump inspections are included in the Collection System Monthly Reports and a summary is produced as part of the I&I Reduction plan, Attachment 2. Highland Park said that they conducted CCTV work back in 2008, said they did some grouting.

#### 10. Field Work

EPA conducted field work and inspected several manholes in Highland Park's Sanitary Sewer System that mainly had past problems and made the following findings:

- a. There were bricks at the bottom of the sanitary manhole at 428 Felton (Photos 664 and 665). The bricks need to be removed;
- b. Downstream of 345 Madison there was a brick in the sewer. The bricks need to be removed;
- c. There were some rags on the ladder at the sanitary manhole at 408 Marlboro (See Photo 2668);



- d. Benner and South 4<sup>th</sup> – there were some rags and debris in sewer. (See Photo 2666)
  - e. Sewer at 66 Harrison has flat slope some debris in sewer – needs cleaning (See Photos 2669 and 2670).
11. Part I.F.6.b.iii of the NJDEP Tier A Municipal Separate Storm Sewer System Permit requires that, “annual certifications shall also include the number of outfalls physically inspected, the number of outfalls found to have dry weather flow, the number of illicit connections found and the number of illicit connections eliminated. Copies of inspection reports shall be submitted with the annual certification for those outfalls found to have dry weather flow.” Please submit the most recent MS4 annual report and records of the outfall inspections conducted in 2014.

### **III. Closing Conference**

A closing conference was held with Highland Park representatives to discuss many of the findings that were identified during this inspection.

### **IV. Attachments**

- 1. EPA Photos
- 2. Incident Reports reported Sewage Overflows Highland Park
- 3. I&I Reduction Quarterly Reports – Sump Pump Disconnection Program
- 4. Collection System Monthly Reports – Example January. 2014

C:\Users\Mlantner\Documents\My\_Documents\My\_Documents\EPA\insp  
2013\mcua\MCUA Satellites\Edison\Edison 2015 SSO CEI.docx

**Table 3:** Comparison of dry and wet weather flows for Highland Park from MCUA's Annual I&I Reports

Connection	2011 Max Difference between wet and dry weather flows (MG)	2011 Max Percent Difference for those 150 % Greater (%)	2011 Dry Period	2012 Max Difference between wet and dry weather flows (MG)	2012 Max Percent Difference for those 150 % Greater (%)	2012 Dry Period	2013 Max Difference between wet and dry weather flows (MG)	2013 Max Percent Difference for those 150 % Greater (%)	2013 Dry Period	2014 Max Difference between wet and dry weather flows (MG)	2014 Max Percent Difference for those 150 % Greater (%)	2014 Dry Period
North	4.180	182	2.30	4.018	187	2.152	5.076	245	2.071	4.685	207	2.26
South	4.156	282	1.474	3.688	312	1.182	4.563	478	0.954	7.111	682	1.043
River View (landing lane)	6.166	476	1.294	1.407	104	1.353	3.362	247	1.361	3.194	260	1.266

ATTACHMENT 1 – Highland Park SSO Inspection, February 25, 2015, Unedited Digital Photographs Nikon Coolpix P510, Murray Lantner, P.E. Env. Eng. EPA Region 2, DECA-WCB	
Photolog	Description
DSCN2662	Monthly Cleaning List
DSCN2663	Sanitary Sewer Map
DSCN2664	Bricks in Sewer 428 Felton
DSCN2665	Bricks in Sewer 428 Felton
DSCN2666	Benner and South 4 <sup>th</sup> Street – Some Rags and Debris in Sewer
DSCN2667	Manhole insert to prevent inflow (at 408 Marlboro)
DSCN2668	Debris on top ladder rung and debris in Manhole at 408 Marlboro
DSCN2669	1206 Harrison – Buildup of material in sewer – needs cleaning
DSCN2670	1206 Harrison – buildup of material in sewer needs cleaning.
DSCN2671	
DSCN2672	Fuel Tank at Highland Park Public Works Facility



Attachment 1 – Photos - Borough of Highland Park Sanitary Sewer  
System Inspection, February 25, 2015  
Unedited Digital Photos Taken by M. Lantner, USEPA Region 2, DECA-WCB  
with Nikon Coolpix P510 Digital Camera





DSCN2665



DSCN2664





DSCN2666



DSCN2667



DSCN2669



DSCN2668





DSCN2671



DSCN2670



DSCN2672

**ATTACHMENT 2 – Incident Reports in Highland Park containing the word sewage January 1, 2010 to June 15, 2015 (that were not odor complaints)**

12-22-2012	COMMUNICATION CENTER	COMMUNICATION CENTER	12-22-2012 13:42
Incident ID Number:	473208	Communications Center Number:	12-12-22-1711-34
Received Date:	12/22/2012		
Incident Description:	CALLER IS REPORTING AN UNCONTROLLED OVERFLOW DUE TO EXCESSIVE RAIN FALL. ENDED AT 13:42		
Incident Type Program:	Water Quality		
Incident Type:	Sewage		
Follow-up Status:			
Program Interest Name:			
Program Interest ID:			
Most Recent Compliance Evaluation:		Most Recent Enforcement Action:	

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
454549	Communication Center	Sewage	Closed, Inv-no viol



Incident ID Number: 456235 Communications Center Number: 13-01-08-2225-49

Received Date: 1/8/2013

Incident Description: UNCONTROLLED OVERFLOW DUE TO STORM EVENT. ENDED 12/27 12:15

Incident Type Program: Water Quality

Incident Type: Sewage

Follow-up Status:

Program Interest Name:

Program Interest ID:

Most Recent Compliance  
Evaluation:

Most Recent  
Enforcement Action:

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
456190	Communication Center	Sewage	Closed, Inv-no viol

Attachment 3

January 8, 2015

Mr. Kevin T. Aiello, Administrator – Environmental Quality  
Middlesex County Utilities Authority  
2571 Main Street  
P.O. Box 159  
Sayreville, New Jersey 08872-0159

Re: I&I Reduction Plan – Quarterly Report

Dear Mr. Aiello:

The following I&I Reduction Plan data is respectfully submitted on behalf of the Borough of Highland Park.

Quarter: Fourth

Year: 2014

<b>I&amp;I Reduction Plan</b>	<b>Quarter</b>	<b>YTD Total</b>	<b>Plan Total</b>
Sump pump inspections	69	95	95
Illegal connections found	1	4	4
Illegal connections removed	1	4	4

Enclosed please also find a corrected third quarter version, the type error was noted at the time this report was prepared.

Should you have any questions or comments, please feel free to contact me at 732-634-1500.

Sincerely,

Robert K. Fullagar  
Licensed Operator

c: Donald Rish, Borough of Highland Park

October 8, 2014  
Revised 1-8-15

Mr. Kevin T. Aiello, Administrator – Environmental Quality  
Middlesex County Utilities Authority  
2571 Main Street  
P.O. Box 159  
Sayreville, New Jersey 08872-0159

Re: I&I Reduction Plan – Quarterly Report

Dear Mr. Aiello:

The following I&I Reduction Plan data is respectfully submitted on behalf of the Borough of Highland Park.

Quarter: Third

Year: 2014

<b>I&amp;I Reduction Plan</b>	<b>Quarter</b>	<b>YTD Total</b>	<b>Plan Total</b>
Sump pump inspections	26	26	26
Illegal connections found	3	3	3
Illegal connections removed	3	3	3

Should you have any questions or comments, please feel free to contact me at 732-634-1500.

Sincerely,

Robert K. Fullagar  
Licensed Operator

c: Donald Rish, Borough of Highland Park

## COLLECTION SYSTEM MONTHLY REPORT

Agency: Borough of Highland Park  
 Reporting Period: " 1-1-14 " to 1-31-14  
 Licensed Operator of Record: ROBERT K FOLLAGAR  
 Total feet of sewer line operated & maintained 152,000 ft

## Section 1 - Collection System Maintenance

1. Feet of Sewer Line Cleaned: 4855  
 2. Feet of Sewer Line Televised: \_\_\_\_\_  
 3. Other collection System Preventive Maintenance  
 (ex: manhole repair, easement clearing, etc.): \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

4. Blockages:  
 Total Blockages: 3 Main Blockages: 0 Lateral Blockages: 3

5. Sanitary Sewer Overflows (SSO's): Attach copy of report sent to NJDEP

DATE	NJDEP HOTLINE #	SSO AMOUNT
	n/A	

6. Odor Complaints: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

7. New Connection: \_\_\_\_\_  
 TWA Required: \_\_\_\_\_

ADDRESS	BLOCK	LOT(S)	GPD
	n/A		

Non TWA Required: Commercial, Multi Family

ADDRESS	BLOCK & LOT	USE	GPO	DATE CONNECTED

Single Family Connections:

ADDRESS	BLOCK	LOT(S)	DATE CONNECTED

## Section 2 - Pump Station Maintenance

1. List any Non Preventative Maintenance Activities (unscheduled, Alarms, Emergencies):

PS#	PROBLEM & REPAIR/MAINTENANCE/CORRECTIVE ACTION MADE

no  
stations

2. List any Major Equipment (pumps, Motors, etc.) Out of Service during the month:

PS#	EQUIPMENT NAME	OUT OF SERVICE DATE	BACK IN SERVICE DATE OR (EST. DATE)

1/1



3. Industrial/Commercial Discharges

List the additions/deletions to the initial list of industrial/commercial discharges:

ADDITIONS	DATE	DELETIONS	DATE

☒ Check if no Addition/Deletions in this report period.

Licensed Operator ROBERT K FULLAGAR  
Print Name

Robert K Fullagar  
Signature

1/7/14  
Date

\*First Report due 2/10/98 should include the initial list of Industrial Commercial Dischargers.

HIGHLAND PARK WATER & SEWER DEPARTMENT

SEWER REPORT

Date: 11/27/14

Name: \_\_\_\_\_

Address: 42 50.6TH AVE

Telephone: (609) 894-0645

Borough Main \_\_\_\_\_ Homeowner's Lateral ✓

If Homeowner's Lateral:

Was Home Notified? Yes ✓ No \_\_\_\_\_

By Telephone ✓ In Person X

If Borough's Main:

Any Other Home On Street Backed Up: Yes \_\_\_\_\_ No ✓

How Many Manholes Backed Up? \_\_\_\_\_

Materials Removed From Main (Be Specific)

⊘

Upon Basement Entry:

Approximate Amount of Water on Floor: \_\_\_\_\_

Where Did Sewer Back Up? \_\_\_\_\_

Approximate Amount of Damage? \_\_\_\_\_

Was A Cleaning Contractor Called Prior to Notification:

Yes \_\_\_\_\_ No \_\_\_\_\_

Name of Contractor: ROTO POTTER Phone Number: \_\_\_\_\_

Approximate Gallons of Water Used: 330

Footage Cleaned: 300

Time Arrived: 9:50 Time Completed: 10:45

Operator Signature: [Signature]

PLEASE USE PEN

MONTHLY SEWER CLEANING								
	DATE	M.H. # TO M.H. #	CUTTER SIZE	NOZZLE SIZE	APPROXIMATE WATER USED	PIPE CLEANED FOOTAGE	OPERATORS INITIALS	DEBRI & PIPE
8" NO. 7TH M.H. IN MIDDLE NEAR HOUSE #130 TO ABBOTT ST.	1-9-14	1901 - 190 191 190A		3"	750 450	398' 361'	<del>JS</del> GS <del>JS</del> GS	
8" NO. 6TH ABBOTT TO RARITAN		187 188 186 187 185 186			250 250 280	268 270 304	<del>JS</del> GS <del>JS</del> GS <del>JS</del> GS	GREASE
167 EXTER ST		339-340			400	325	GS <del>JS</del>	
12" SO. PARK EASEMENT 9TH - 11TH		210 220 208 210			320 400	484 300	<del>JS</del> GS <del>JS</del> GS	
10 WASHINGTON		228-227			400	240		
261 SO 9TH		407A-415			400	270	GS <del>JS</del>	
66 HARRISON AVE		140A-140A			380	300		
8" NO. 3RD		56-57			260	213	<del>JS</del> GS	GREASE
CHARLIE BROWNS								
12" GREASE NO 2ND & EAST		59-43			300	312	<del>JS</del> GS	GREASE

4840

4075

HIGHLAND PARK WATER & SEWER DEPARTMENT

SEWER REPORT

Date: 1-7-14

Name: \_\_\_\_\_

Address: 49 BROOKDALE

Telephone: \_\_\_\_\_

Borough Main \_\_\_\_\_ Homeowner's Lateral ✓

If Homeowner's Lateral:

Was Home Notified? Yes ✓ No \_\_\_\_\_

By Telephone ✓ In Person \_\_\_\_\_

If Borough's Main:

Any Other Home On Street Backed Up: Yes \_\_\_\_\_ No \_\_\_\_\_

How Many Manholes Backed Up? \_\_\_\_\_

Materials Removed From Main (Be Specific)

SEWER CAME FROM TOILET ON THE

FLOOR THE GUY WAS CLEARING IT UP.

Upon Basement Entry:

Approximate Amount of Water on Floor: ?

Where Did Sewer Back Up? ?

Approximate Amount of Damage? \_\_\_\_\_

Was A Cleaning Contractor Called Prior to Notification:

Yes \_\_\_\_\_ No \_\_\_\_\_

Name of Contractor: JACK BOLAN Phone Number: \_\_\_\_\_

Approximate Gallons of Water Used: \_\_\_\_\_

Footage Cleaned: \_\_\_\_\_

Time Arrived: 10:00 Time Completed: 10:45

Operator Signature: GLB

THEY  
TOLD HER  
THEY FIT  
HER ~~LINE~~  
LINE. MUST  
HAVE BEEN  
BORO MAIN.  
GLB  
1-7-14

HIGHLAND PARK WATER & SEWER DEPARTMENT

SEWER REPORT

Date: 11/2/14

Name: \_\_\_\_\_

Address: 315 WAYNE ST

Telephone: \_\_\_\_\_

Borough Main \_\_\_\_\_ Homeowner's Lateral ☒

If Homeowner's Lateral:

Was Home Notified? Yes ☒ No \_\_\_\_\_

By Telephone \_\_\_\_\_ In Person ☒

If Borough's Main:

Any Other Home On Street Backed Up: Yes \_\_\_\_\_ No \_\_\_\_\_

How Many Manholes Backed Up? \_\_\_\_\_

Materials Removed From Main (Be Specific)

2

Upon Basement Entry:  
Approximate Amount of Water on Floor: \_\_\_\_\_

Where Did Sewer Back Up? \_\_\_\_\_

Approximate Amount of Damage? \_\_\_\_\_

Was A Cleaning Contractor Called Prior to Notification:

Yes \_\_\_\_\_ No \_\_\_\_\_

Name of Contractor: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Approximate Gallons of Water Used: 200

Footage Cleaned: 240'

Time Arrived: \_\_\_\_\_ Time Completed: \_\_\_\_\_

Operator Signature: J. H. B.